

Our ref: JD/lcr/DLightbourne  
Email: Jdurham@amicuslaw.bm

Tuesday, July 16, 2013

Christian Luthi  
Conyers, Dill & Pearman  
Clarendon House  
#2 Church Street  
Hamilton, HM 12

Dear Mr. Luthi:

**Re: Dilton Lightbourne -v- The Trustees of The James Richardson Trust**

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We act on behalf of the above mentioned Mr. Dilton Lightbourne in the above matter.

We understand that this matter has become stagnant, subsequent to the Order of Justice Kawaley dated 10th day of February, 2012. We have had the opportunity to review your client's Defense in this matter and in particular, the judgment in the matter of Catherine Amanda Williams which is referred therein. In this regard, we have advised our clients that any future claim should be constrained to that portion of land previously held by the Trust which was awarded in the said ruling to Catherine Amanda Williams.

We note from your defense that it is your position that enforcement of the said judgment is beyond the limitation period. It is our position that this is not a matter of enforcement as the proceedings in which the judgment was given were in respect of the declaratory relief. In this regard we enclose herewith an authority on the said point, namely the case of *Carter et al. v. Pasadena Town*, at paragraph 11 of the same.

Our clients have obtained documentation supporting their familial connections to Catherine Amanda Williams and in the circumstances, it is our position that they are beneficially entitled to the said Land. In this regard, we refer to our clients affidavit dated 3rd January, 2012 and the Exhibits therein.

We are in possession of a site plan carried out by QShip Enterprise Ltd. dated November 2011 which sets out the land granted to Catherine Amanda Richardson in the said judgment based upon several detailed references. We are also in possession of a Memorandum by a former Trustee Mr. Bernard T. Gosling which suggests that the said Catherine Amanda Richardson took possession of the said plot of land.

In the circumstances we propose that the land be valued and the said valuation amount be paid to our client in full and final settlement of this matter.

We trust that you will find the above a reasonable approach to discharging this matter which has become quite protracted.

If we have not heard from you within fourteen (14) days of the date of this letter we are instructed to amend our Writ of Claim to reflect the above position and proceed with further litigation.

Yours faithfully,  
Amicus Law Chambers Ltd.

  
Jaymo Durham

Encl.